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FLORIDA'S SPACE COAST



Roland P. Depelteau
IS Manager, Library Computer Services
Brevard County Library System
308 Forrest Avenue, Cocoa, FL 32922-7781

Telephone: (321) 633-1827
Fax: (321) 633-1837

APPEAL

CC Docket # 02-6
Billed Entity Number: 127691
Form 471 Application Number: 637225
Funding Request Numbers: 1764250, 1764309, 1764329, 1764342

Funding Year 2008 Form 471 Postmarked Outside of Window

"Your Form 471 application was postmarked on 02/08/2008, which is AFTER the funding year 2008-2009 filing window closed at 11:59 p.m. EST on Thursday, February 7, 2008."

Roland Depelteau, Information Systems Manager
Brevard County Library System
308 Forrest Avenue
Cocoa, Florida 32922-7732
BEN: 127691
321-633-1827
321-633-1837 (fax)
rdepelteau@brev.org

The Brevard County Library System has never missed an E-rate filing window since the program's inception in 1991. I make this statement only to support how critical our E-rate funding is to the Brevard County Library System. We have experienced severe cutbacks in all funding areas for our libraries, from personnel losses to depreciated budgets. Losing our crucial E-rate funding for the 2008-2009 year will severely impact the maintenance and survival of technology in our 17 libraries in Brevard County.

The Brevard County Library System missed the filing window for funding year 2008-2009 by less than the hours in one day. The late filing of our 471 was due to the inexperience and lack of training of my new assistant assigned to the E-Rate program. My assistant is a part time employee who was very new to the position and cross training

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was unavailable. Additionally, she was unable to attend an E-Rate training session due to transportation and logistics constraints. My assistant obtained a copy of the E-rate training manual and used that as a basis for her E-rate information. The biggest factor in the late filing was a misunderstanding of what was required to file the form 471, as shown in exhibit I Block 5 section 23 of the Year 11 E-Rate training workbook. After studying the Year 11 E-Rate training workbook, my assistant determined that an exact, calculated recurring amount from the previous funding year needed to be specified for each month of service on the form 471. Obtaining these costs required expertise in the AT&T Bill Management System which is the program to interrogate the AT&T bills. My assistant worked feverishly for many days prior to the filing window to learn the AT&T Bill Management System and to extract the data.

Due to cutbacks in the County's Telecommunications department personnel, we now have to extract our own billing information from the entire county's AT&T Billing System; this is a time-consuming process, particularly for an inexperienced assistant. The program that allows us to interrogate the entire AT&T billing for the County is complicated, cumbersome and unintuitive at best. My assistant encountered an enormous learning curve not only for the E-rate program itself and its workings but to also understand and use the AT&T billing extract program. There was no training available for the AT&T billing extract program and assistance from AT&T was limited to technical questions only. So, the bulk of my assistant's time was spent attempting to learn this program and get the billing information she thought she needed for the form 471 filing.

In defense of my assistant I was not available to assist her as I would normally be because of frequent time consuming contract negotiations for the purchase of a new integrated library system, which by the way is a direct byproduct of our E-rate funding. I believe my assistant made every attempt in my absence to get help from USAC, AT&T and the County Telecommunications Department. My assistant truly did not understand the scope of what was required.

Exhibits I and II are taken from the Year 11 E-Rate training workbook. Exhibit III was a handout from the County's Telecommunications Department. These confusing documents were used to help prepare the filing of form 471. They were instrumental in the difficult process of retrieving billing data and the misunderstanding of what was required to file the form 471.

In closing, I request your deepest consideration of this appeal. In this rare instance it was mere hours after the filing window deadline that the form 471 was filed. I zealously request that USAC and the FCC waive the late filing of our form 471 and accept the Brevard County Library System form 471 for continued processing. Thank you for your attention to this matter as I eagerly await your decision.

Robert D. Dwyer 7/30/2008

Exhibit III

10/10/014:27 PM

BMS - CIRCUITS QUERY

Click the "Query" icon

From the category drop down menu "highlight Monthly Charges"

At the bottom of the screen click "Recall"

Click the report that say "PRE - Station & Circuits Address" read the instructions in the box then make the necessary adjustments.

Click "Recall"

When the Query comes up; Move the column labeled "Customer Id" to the front of the report. Change the column labeled "Billing Number" to "Recurring Amount" under this column. Group by, Total by - "NO", Total on - "Yes", Sort by - Ascending, Show - Yes** - then move column to the last position. Then delete the column labeled "Address Text" (right click and delete it). Under the column labeled "Station or Circuit Flag" make the "Compare line - equal to C/F/I". This just sets up the report for printing.

Click "Print"

Click "Report"

Click "Print"

Print last months copy of the backbone spreadsheet to be used as your worksheet. Make sure to change the date on the backbone spreadsheet to the month of the clubbill that you are billing for.

Use this report as a guide match the circuit #'s on the print out with the list on the Backbone.xls excel spreadsheet. If there are any new circuits you must add them to the backbone spreadsheet. Use the Original clubbill to update the cost of each circuit in the Backbone spreadsheet.

*Make 3 copies of the Backbone spreadsheet and give one to Joe, Art, Cindi. Keep original for your file. (Top drawer of gray cabinet).

Print
Report → BMS
Layout
Landscape

-lick in grey box on top drag it when a red handle appears

Run?

Equal
C
F
I

S = Station

Lib

Joe
Art
Cindi
Codes

Cindy Rossini
617-7393 ext. 52799
Billing #

If there are
<Credit> go into
backbone spread
sheet to adjust
circuit amount.

Right click
Print
PDF

Exhibit II

b. Item 3 – Billed Entity Number.

If both of these items are blank, and the information cannot be obtained from the page headers, the Form 471 will be rejected.

3. Complete Submission of Each Block 5 Funding Request: Each Block 5 Funding Request must meet the following requirements in order to be data entered as part of the Form 471. If any of the requirements is missing, the Funding Request will be automatically deleted from the form. If all of the Block 5 Funding Requests fail to meet these requirements, the form will be rejected.

Each Block 5 Funding Request must, at a minimum, include:

- a. Item 13 or Item 14 – Either the Service Provider Identification Number or the Service Provider Name;
- b. Item 23 – Sufficient information for the SLD to see or accurately calculate your funding commitment request in Item 23K. For example, the SLD could accurately calculate your funding commitment request if you provided entries in Item 23E (Annual pre-discount amount for eligible recurring charges), Item 23H (Annual eligible pre-discount amount for non-recurring services), and Item 23J (Discount from Block 4 Worksheet). Please note that you can't increase your request after filing your Form 471, unless you submit a new Form 471. Therefore, you should take care to complete ALL applicable fields in Item 23.

Grid
Sheet

ATOT
BMS
AD
recurring vs
non-recurring

In addition to the requirements listed above for Block 5, if certain components reflect a violation of program rules, they will invalidate the Funding Request featured for that service item. Discounts on services reflected in such Funding Requests will not even be entered into the SLD system; such a Funding Request will be automatically rejected, even while other Block 5 Funding Requests may be honored.

4. Valid Certification: Block 6, Item 38 – Signature of authorized person must be completed and all certifications must be included in the submission. If Item 38 is left blank or the page containing the Block 5 certifications is missing, the Form 471 will be rejected. If the Block 6 certification is not received or postmarked within the application filing window, the entire application will be considered as filed outside of the window.

Exhibit I

(*) need to get the monthly charges from each company - New Edge / AT&T / etc. - ~~multiple~~ ^{multiple} by 12 ~~divisible by 2~~ ^{divisible by 2}

Entity Number _____		Applicant's Form Identifier _____	
Contact Person _____		Phone Number _____	
Block 4: Discount Funding Request (d) Instructions: Use one Block 5 page for EACH service (Funding Request Number) for which you are requesting discounts. Make as many copies of this page as needed, and number the completed pages to assure that they are all processed correctly.			
10 <input type="checkbox"/> If this is a duplicate Funding Request (e.g., of an FRN that is not yet approved, under appeal, etc.), check this box and enter the original FRN in the space provided:		Block 5, page _____ of _____	
11 Category of Service (only ONE category should be checked) <input checked="" type="checkbox"/> PRIORITY 1 (2) Telecommunications Service <input checked="" type="checkbox"/> Internet Access (1) <input type="checkbox"/> PRIORITY 2 Internal Connections Other than Basic Maintenance <input type="checkbox"/> Basic Maintenance of Internal Connections		23 Calculations A. Monthly charges (total amount per month for service) B. How much of the amount in A is ineligible? C. Eligible monthly pre-discount amount: (A minus B) D. Number of months service provided in funding year E. Annual pre-discount amount for eligible recurring charges (C x D) F. Annual non-recurring charges G. How much of the amount in F is ineligible? H. Annual eligible pre-discount amount for non-recurring charges (F minus G) I. Total funding year pre-discount amount (E + H) J. Discount from Block 4 Worksheet K. Funding Commitment Request (I x J)	
12 Form 470 Application Number		Recurring Charges Non-Recurring Charges Total Charges	
13 SPIN - Service Provider Identification Number			
14 Service Provider Name		Attachment 50.26	
15a <input checked="" type="checkbox"/> Check this box if this Funding Request is for non-contracted tariffed or month-to-month services.			
15b Contract Number			
15c <input type="checkbox"/> Check this box if this Funding Request is covered under a master contract (a contract negotiated by a third party, the terms and conditions of which are then made available to an eligible entity that purchases directly from the service provider).			
15d <input type="checkbox"/> Check this box if this Funding Request is a continuation of an FRN from a previous funding year based on a multi-year contract. If so, provide that FRN here:			
16a Billing Account Number (e.g., billed telephone number)			
16b <input checked="" type="checkbox"/> Check this box if there are multiple Billing Account Numbers and attach a complete list of those numbers to this page.			
17 Allowable Vendor Selection/Contract Date (mm/dd/yyyy)			
18 Contract Award Date (mm/dd/yyyy)			
19 Service Start Date (mm/dd/yyyy)			
20a Service End Date (mm/dd/yyyy)			
20b Contract Expiration Date (mm/dd/yyyy)			
21 Description of this Service You MUST attach a description of the service, including a breakdown of components, costs, manufacturer name, make and model number. You must include any additional account or telephone numbers if the billed account has multiple numbers. Label the description with an Attachment Number, and note number to source provided.			

Substant - Telecom -

Separate forms for each

SPIN - Service Provider Identification Number
 Service Provider Name
 1 - New Edge
 2 - AT&T
 3 - phone
 probably have 3 VS
 Belle's
 Belle's
 model
 more

AT&T

CURRENT CHARGES FOR AT&T
CHARGES FOR DEPARTMENT IDENTIFIER - LIBCOCOA
CHARGES FOR EARNING NUMBER 321 633-1785

(CONT)

EARNING NUMBER 633-1785

1424. CREDIT FOR DECREASE IN RATES FOR NETWORK ACCESS AND
FEDERAL UNIVERSAL SERVICE CHARGE, DUE TO CHANGES IN
THE RULES OF THE FCC

FROM JUN 30 07 THRU JUL 15 07 (\$.09/MO) (D)05CR

1425. CREDIT FOR DECREASE IN RATES FOR NETWORK ACCESS AND
FEDERAL UNIVERSAL SERVICE CHARGE, DUE TO CHANGES IN
THE RULES OF THE FCC

FROM JUN 30 07 THRU JUL 15 07 (\$.18/MO) (D)10CR

TOTAL RECURRING OC&C FOR SO-RATE CHANGE 1.62CR

TOTAL NONRECURRING OC&C FOR SO-RATE CHANGE .00

TOTAL OC&C DEBITS 4.05

TOTAL OC&C CREDITS 5.67CR

TOTAL OTHER CHARGES AND CREDITS 1.62CR

LOCAL USAGE

MEMORYCALL USAGE SUMMARY FOR 321 633 7119

	MAILBOX NUMBER	USER	CALLER	TOTAL	MINUTE	MINUTES	
		ACCESSES	ACCESSES	MINUTES	ALLOWANCE	BILLED	
1426.	321 633-7119	18.	2	5	90	0	.00
	TOTAL LOCAL USAGE						.00

TOTAL FOR EARNING NUMBER 321 633-1785

TOTAL FOR DEPARTMENT IDENTIFIER - LIBCOCOA

1,237.21

SAMPLE of BILLING ①

AT&T

CURRENT CHARGES FOR AT&T
CHARGES FOR DEPARTMENT IDENTIFIER - LIBCOCOA
CHARGES FOR EARNING NUMBER 321 633-1785

MONTHLY LOCAL SERVICE	
1402.MONTHLY LOCAL SERVICE - JUL 16 THROUGH AUG 15	668.74
BREAKDOWN BY STATION NUMBER	
321 433-4425	7.14
321 433-4426	7.14
321 433-4509	7.14
321 633-1785	11.34
321 633-1786	7.14
321 633-1787	7.14
321 633-1788	7.14
321 633-1789	7.14
321 633-1790	7.14
321 633-1792	11.34
321 633-1793	15.54
321 633-1794	11.34
321 633-1795	11.34
321 633-1796	15.54
321 633-1799	7.14
321 633-1803	7.14
321 633-1804	7.14
321 633-1805	7.14
321 633-1806	7.14
321 633-1807	7.14
321 633-1808	7.14
321 633-1809	11.34
321 633-1810	21.34
321 633-1811	17.14
321 633-1812	7.14
321 633-1813	7.14
321 633-1814	7.14
321 633-1815	17.14
321 633-1816	17.14
321 633-1817	7.14
321 633-1818	7.14
321 633-1820	7.14
321 633-1821	7.14
321 633-1822	7.14
321 633-1823	7.14
321 633-1824	7.14
321 633-1825	7.14
321 633-1826	7.14
321 633-1827	7.14
321 633-1828	11.34
321 633-1830	7.14
321 633-1832	11.34
321 633-1835	7.14
321 633-1836	7.14
321 633-1837	7.14
321 633-1838	7.14
321 633-1839	7.14
321 633-1840	7.14
321 633-1841	7.14
321 633-1842	7.14
321 633-1843	7.14
321 633-1844	7.14
321 633-1887	7.14
321 633-1915	7.14
321 633-1919	7.14
321 633-1964	7.14

SAMPLE OF BILLING (2)

AT&T

CURRENT CHARGES FOR AT&T
CHARGES FOR DEPARTMENT IDENTIFIER - LIBCOCOA (CONT)
CHARGES FOR EARNING NUMBER 321 633-1785

321 633-1977	7.14
321 633-7119	7.14
321 633-7127	7.14
321 633-7138	7.14
321 633-7142	7.14
321 633-7157	7.14
321 633-7159	7.14
321 633-7166	7.14
321 633-7168	7.14
321 633-7173	7.14
321 633-7187	7.14
321 633-7190	7.14
321 633-7191	7.14
321 633-7192	7.14
321 633-7193	7.14
321 633-7194	7.14
321 633-7195	7.14
321 633-8191	7.14
321 635-7826	7.14
321 635-7833	7.14
321 635-7838	7.14
321 635-7839	7.14
321 635-7845	7.14
321 635-7847	7.14
321 635-7949	7.14
COMMON EQUIPMENT/SERVICE WITH NO STATION NUMBER ASSIGNED	.00

1403.FED UNIV SVC CHRGE-MULTI. 6.48

BREAKDOWN BY STATION NUMBER

321 433-4425	.08
321 433-4426	.08
321 433-4509	.08
321 633-1785	.08
321 633-1786	.08
321 633-1787	.08
321 633-1788	.08
321 633-1789	.08
321 633-1790	.08
321 633-1792	.08
321 633-1793	.08
321 633-1794	.08
321 633-1795	.08
321 633-1796	.08
321 633-1799	.08
321 633-1803	.08
321 633-1804	.08
321 633-1805	.08
321 633-1806	.08
321 633-1807	.08
321 633-1808	.08
321 633-1809	.08
321 633-1810	.08
321 633-1811	.08
321 633-1812	.08
321 633-1813	.08
321 633-1814	.08
321 633-1815	.08
321 633-1816	.08
321 633-1817	.08
321 633-1818	.08

SAMPLE of BILLING (3)